

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

TIFFANY HONDRAS,)	
)	
Plaintiff,)	
)	
vs.)	13 CV 1846
)	
CAROL McGHEE, et al.,)	Judge THARP
)	
Defendants.)	

PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT AGREEMENT

Plaintiff Tiffany Hondras respectfully requests that this Court order the City of Chicago to place the settlement in this case on the agenda of the January 13, 2016 City Council meeting:

1. In this civil rights case, Plaintiff brings claims of unlawful search and seizure, false arrest, unlawful strip search, excessive force, and conspiracy against five Chicago police officers.
2. On September 30, 2015, the parties settled this case shortly before trial. Due to the amount of the settlement, the Chicago City Council must approve it before issuing payment to Plaintiff and her attorneys.
3. Plaintiff submitted executed settlement paperwork to the City of Chicago on November 4, 2015. However, the settlement was not placed on the City Council's agenda for either November or December 2015.
4. On today's date, the undersigned learned from defense counsel that the settlement in this case will not be placed on the City Council's January 2016 agenda, and defense counsel was unable to provide a date for when the City Council will hear this matter. Even if the settlement is on the City Council's February 2016 agenda, under the terms of the settlement agreement, Plaintiff and her attorneys will not receive payment until April 2016, seven months after settling this case.
5. Thus, Plaintiff respectfully requests that this Court order the City of Chicago to place the settlement in this matter on the agenda for the January 13, 2016 City Council meeting.

WHEREFORE, Warren requests that this Court direct the City of Chicago to place the settlement in this case on the agenda for the January 13, 2016 City Council meeting.

Respectfully Submitted,

/s Kevin T. Turkcan
One of Plaintiff's Attorneys

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